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December 15, 2020

To: Honorable Victor Marrero
United States District Judge
Southern District Of New York
500 Pearl St, Suite 1610
New York, NY 10007

VIA ELECTRONIC MAIL TO CHAMBERS
WITH A COPY TO DEFENDANTS

RE: **KDH Consulting Group LLC v. Iterative Capital Management L.P. et al.**
20-cv-03274 | Renewed TRO Security Motion | Request for an Extension

Dear Hon. Judge Marrero:

This office represents Plaintiff in the above-referenced matter.

On November 30, 2020, the Court granted Defendants a leave to renew their motion to recover the security posted by Plaintiff KDH Consulting Group LLC pursuant to Rule 65(c) of the Federal Rules of Civil Procedure ("TRO Security"), which the Court had previously denied.

On December 11, 2020, Defendants' filed the renewed motion ("Second Motion"). On December 14, the Court directed Plaintiff to respond to the Second Motion by December 18, 2020.

Plaintiff needs additional time to respond to the Second Motion because of the prior commitments and the tight pre-holiday schedule, which includes unrelated litigation and closing several transactions this year. Also, Defendants were not constrained in volume or in time when they received the Court's leave to renew, and filed the Second Motion 11 days after the leave.

Defendants (cc'd to this letter) consent to a 10-day extension for the Plaintiff's response to be filed by December 28, 2020.

Plaintiff respectfully requests a 10-day extension to respond to the Second Motion. There were no prior requests for an extension.

Sincerely,

A handwritten signature in blue ink that reads "Rika Khurdayan".
Rika Khurdayan, Esq.

cc: Robert Boller
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